

Remarks

Applicant thanks the Examiner for his careful consideration of the application.

Claim 33 is pending in the application.

Claim Rejections - 35 USC § 102

The Examiner rejected claim 33 under 35 USC § 102(b) as being anticipated by Richards (US Patent No. 769,920) ("Richards"). Applicant respectfully traverses this rejection.

The Examiner should withdraw the rejection to claim 33 as the Examiner has not shown that Richards discloses all the limitations of claim 33. For example, the Examiner has not shown that Richards discloses locating a pivot point with reference to a centerline between the first pulley and the second pulley and a theoretical intersection of the belt strands such that application of torque to the first pulley in a first direction proportionally elevates average belt tension, while application of torque to the first pulley in the opposite direction proportionally decreases average belt tension. The Examiner asserts that the pivot point G disclosed by Richards is located with reference to a centerline between the first pulley and the second pulley and a theoretical intersection of the belt strands such that application of torque to the first pulley in a first direction proportionally elevates average belt tension, while application of torque to the first pulley in the opposite direction proportionally decreases average belt tension. However, the Examiner does not point to any portion of Richards that discloses that pivot point G is located for any such reason. In the written description, Richards appears to only give consideration to the center of gravity of the dynamo. Therefore, the objective and overall approach of the Richards invention is fundamentally different than that of the present invention. Richards's invention appears to be essentially a fixed-center belt-pulley system with an added "safety mechanism" to limit belt tension when torque-loads get severe. This is accomplished by allowing the dynamo to move toward the car-axle in severe torque load situations. In contrast, the present invention

is a floating-center belt-pulley system. The motor is on a floating center, tensioned away from the drum which allows belt tension to vary dynamically at all times in accordance with the direction and magnitude of motor-torque. Unlike Richards' invention, the belt tension in applicant's invention will increase when severe torque loads are encountered in a given rotation-direction.

Moreover, the illustrations from the original patent do not include any of the lines or dimensions indicated in the Examiner's rejection letter. The Examiner is merely presuming that Richards had this understanding without any basis. Even if the sketched understanding is attributed to Richards, it is incorrect and incomplete in demonstrating the key geometry associated with the invention. The dimension from the pivot point to the theoretical intersection of the belt strands is not taken parallel to the line connecting the two pulley-axes, which applicant's invention involves. Instead, the dimension seems arbitrarily horizontal. More fundamentally, the sketch completely lacks any 2nd dimension locating the pivot point (a "y" dimension, if you will; also involved in applicant's invention), and of course, 2 dimensions are required to define the pivot point location in the plane of view. In short, the sketch seems ad-hoc, and the dimension arbitrary. It does not suggest an understanding of key considerations in locating the pivot point.

For each of the foregoing reasons, the Examiner should withdraw the rejection to claim 33.

Conclusion

No additional fee is believed to be required for this amendment. However, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025. This also constitutes a request for any needed extension of time and authorization to charge all fees therefor to Xerox Corporation Deposit Account No. 24-0025.

Application No. 10/721,386

A telephone interview is respectfully requested at the number listed below prior to any further Office Action, i.e., if the Examiner has any remaining questions or issues to address after this paper. The undersigned will be happy to discuss any further Examiner-proposed amendments as may be appropriate.

Respectfully submitted,

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